

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------|---|--------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 00-54 |
| |) | |
| DAVID MAIS |) | |

GOVERNMENT'S MOTION FOR AN EXTENSION OF TIME

AND NOW comes the United States of America, by its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Gregory J. Nescott, Assistant United States Attorney for said District, and respectfully represents the following:

1. The defendant was arraigned in the above-captioned case on June 23, 2006.

2. On or about July 6, 2006, the defendant sought and received an extension of time for filing his pretrial motions, until July 18, 2006.

3. On or about July 24, 2006, the defendant sought and received another extension of time for filing his pretrial motions, until August 17, 2006. The government consented to both continuance requests.

4. The defendant subsequently filed certain pretrial motions on August 17, 2006, and additional motions under seal, which were served on the government on August 18, 2006.

5. The government's response to all pretrial motions is presently due to be filed by September 1, 2006.

6. Counsel for the government is preparing his response, but requests five additional business days to complete his response to the defendant's pretrial motions.

7. The government would therefore request that the Court grant an extension of time in this matter until September 11, 2006 for the government to file its response to the defendant's pretrial motions.

8. Counsel for the defendant, John Knorr, Esquire, has no objection to the granting of this continuance.

WHEREFORE, the government respectfully requests that it be granted five additional business days, or until September 11, 2006, to file its response to the defendant's pretrial motions.

Respectfully submitted

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United States Attorney

s/ Gregory J. Nescott
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